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IN THE THIRD JUDICIAL DISTRICT COURT, SALT LAKE DEPARTMENT

SALT LAKE COUNTY, STATE OF UTAH

STATE OF UTAH

Plaintiff,

vs.

GRANT KEITH AAGARD,
4085 S Cumberland Dr
Holladay, Utah 84124
D.O.B. 07/09/1956
S.S.# 528-76-8545

Defendant.

SECOND AMENDED INFORMATION

Criminal No. 071902555

Judge: _____

THE STATE OF UTAH TO THE ABOVE-NAMED DEFENDANT:

A complaint has been made by Robert E. Steed, Assistant Attorney General, that you
committed the crime of:

COUNT I

**ABUSE, NEGLECT OR EXPLOITATION OF A VULNERABLE ADULT, a Third
Degree Felony**, in violation of §76-5-111(4)(a)(iii), Utah Code Ann. (2002), in Salt Lake

County, State of Utah, on diverse occasions on or between August 28, 2000, and February, 2006, in that the defendant, GRANT KEITH AAGARD, a party to the offense, intentionally or knowingly, unjustly or improperly used or managed the resources of a vulnerable adult for the profit or advantage of someone other than the vulnerable adult; and the aggregate value of the resources used or the profit made exceeds \$1,000, but is less than \$5,000.

COUNT II

THEFT BY DECEPTION, a Third Degree Felony, in violation of §76-6-405, Utah Code Ann. (1973), in Salt Lake County, State of Utah, on diverse occasions on or about August 28, 2000 through February, 2006, in that the defendant, GRANT KEITH AAGARD, a party to the offense, did knowingly or intentionally commit theft by obtaining or exercising control over property of another by deception with a purpose to deprive him thereof; to wit: Leola Fagan, with a purpose to deprive her thereof; and the value of the property exceeds \$1,000, but is less than \$5,000.

COUNT III

THEFT BY DECEPTION, a Third Degree Felony, in violation of §76-6-405, Utah Code Ann. (1973), in Salt Lake County, State of Utah, on diverse occasions on or about August 28, 2000 through February, 2006, in that the defendant, GRANT KEITH AAGARD, a party to the offense, did knowingly or intentionally commit theft by obtaining or exercising control over property of another by deception with a purpose to deprive him thereof; to wit: Leola Fagan, with a purpose to deprive her thereof; and the value of the property exceeds \$1,000, but is less than \$5,000.

COUNT IV

THEFT BY DECEPTION, a Third Degree Felony, in violation of §76-6-405, Utah Code Ann. (1973), in Salt Lake County, State of Utah, on diverse occasions on or about August 28, 2000 through February, 2006, in that the defendant, GRANT KEITH AAGARD, a party to the offense, did knowingly or intentionally commit theft by obtaining or exercising control over property of another by deception with a purpose to deprive him thereof; to wit: Leola Fagan, with a purpose to deprive her thereof; and the value of the property exceeds \$1,000, but is less than \$5,000.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES:

Lt. Tina Minchey, Daniel Decker, Leola R. Fagan, Laura Carroll, Key Bank, Wells Fargo Bank, United Heritage Insurance Company.

Lt. Tina Minchey-Verkler
Utah Medicaid Fraud Control Unit
Utah Attorney General's Office

SUBSCRIBED AND SWORN to before me this ____ day of _____, 2007.

JUDGE

Authorized for presentment and filing this ____ day of _____, 2007.

MARK L. SHURTLEFF
Attorney General

By _____
Robert E. Steed
Assistant Attorney General